

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)
v.)
Plaintiff,)
RAMIZ HODZIC,)
Defendant.)

) Case No. 4:15 CR 49 CDP
(DDN)

**UNOPPOSED MOTION BY DEFENDANT HODZIC TO CONTINUE SENTENCING
AND FOR ADDITIONAL TIME TO FILE SENTENCING MEMORANDUM**

Defendant Ramiz Hodzic through his attorney, Assistant Federal Public Defender Diane L. Dragan requests that the Court continue the sentencing to a date between November 12 and November 14, 2019, if that works for the Court. Over the last 30 days, Counsel obtained several boxes of Mr. Hodzic's belongings from the government. The boxes included photographs, photo albums, videos, VHS tapes, computer equipment and other documents related to Mr. Hodzic's family and his military service. The boxes also include Official military documents that discuss his service and war injuries. They also included books which discuss his military awards and the deaths of his father and many of his fellow Bosnian soldiers. All of these documents and books are in Bosnian. Counsel is still actively trying to have some of these documents translated for use in his sentencing memorandum.

Additionally, since making the prior request for continuance, undersigned counsel and the mitigation investigator and the legal research and writing attorney all assigned to work on Mr. Hodzic's case were also all assigned to a death-eligible case involving a carjacking murder on September 10, 2019. The nature and seriousness of that case required all team members to immediately invest considerable time and efforts on that case. Counsel has also been assigned multiple other cases in the last month involving serious gun and drug crimes and handled several sentencing, pleas, revocations and duty days.

Counsel along with her mitigation specialist and research and writing attorney are all actively working on the sentencing memorandum in this case but we need additional time to finalize the memorandum and exhibits for the Court's consideration. The government has no opposition to this request but would like the sentencing completed prior to November 15, 2019 to accommodate issues in co-defendant Rosic's case.

Dated October 9, 2019.

Respectfully submitted,

/s/Diane L. Dragan
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Attorney for Defendant Hodzic

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2019, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Assistant United States Attorney Matthew Drake.

/s/Diane L. Dragan